

THE DOCUMENT DOES NOT CONTAIN A FAIR EVALUATION OF THE DESIGNEE PROGRAM CURRENTLY IN USE BY THE FAA. AS A FORMER DESIGNEE, I CAN ATTEST TO THE FACT THAT THE PRESENT SYSTEM DOES NOT PROVIDE ADEQUATE OVERSIGHT BY THE FAA DUE TO A LACK OF INSPECTORS. THE DESIGNEE'S ARE PAID BY THEIR CUSTOMER TO PERFORM A SERVICE. ONCE MONEY IS INTRODUCED INTO THIS EQUATION YOU WILL EXPERIENCE CORRUPTION IN THE DESIGNEE PROCESS. PLEASE REFER YOURSELVES TO THE DME SITUATION THAT OCCURRED WITHIN THE LAST TWO YEARS IN ORLANDO FLORIDA. THE FAA HAD TO RETEST OVER 2500 A&P CERTIFICATE HOLDERS DUE TO CORRUPTION ON THE PART OF DESIGNEES. MANY PILOTS LODGE COMPLAINTS AGAINST DPE'S BECAUSE OF THEIR EXCESSIVE CHARGES TO TAKE THE EXAMINATION. THE FAA IS AWARE OF THE PAST AND PRESENT PROBLEMS REGARDING CORRUPTION WITHIN THE DESIGNEE SYSTEM. THIS DATA IS NOT AVAILABLE TO THE FAA INSPECTORS OR TO THE GENERAL PUBLIC. YET THESE PROBLEM DESIGNEES STILL PROVIDE SERVICES TO PERSONS. DOES'NT THE PUBLIC HAVE A RIGHT TO MAKE THEIR SELECTION OF A DESIGNEE BASED ON CONFIDENCE OF THE RESPONSIBLE OFFICE? IT IS A TERRIBLE SITUATION AND TERRIBLE SERVICE THAT THE FAA ALLOWS TO BE GIVEN TO THE PUBLIC.

PLEASE LOOK INTO THE RATIO OF FAA INSPECTORS VERSUS DESIGNEES. ANY LOGICAL EXAMINATION OF THE RATIO WILL NO DOUBT PROVIDE CONCLUSIVE EVIDENCE OF THE FAA OVERSIGHT PROBLEMS WITHIN THE SYSTEM. ADDING DESIGNEE'S AT THIS POINT WITHOUT INCREASING THE INSPECTOR FORCE WILL NO DOUBT INCREASE THE LEVEL OF RISK ASSOCIATED POOR PERFORMANCE AND CORRUPTION.

THE FAA CONTINUES TO MAINTAIN A POSITION THAT DESIGNEES ARE HONORABLE PERSONS. NO BACKGROUND CHECKS ARE CONDUCTED ON THESE INDIVIDUALS TO ENSURE THEY DO NOT HAVE A CRIMINAL BACKGROUND OR HAVE AN ACCEPTABLE FINANCIAL SITUATION. THERE ARE PEOPLE INVOLVED IN THE DEVELOPMENT OF THE DESIGNEE PROGRAM THAT HAVE DEVELOPED THE PROCESS TO CONDUCT BACKGROUND INVESTIGATIONS THAT HAVE BEEN IGNORED BY THE PEOPLE WHO WROTE THIS NPRM AND THE DESIGNEE ORDER. THIS IS AN EXPENSE THAT THE DESIGNEES SHOULD BARE IF THEY WANT TO BE A DESIGNEE.

THE FAA HAS NO SYSTEM FOR COMPLAINTS TO BE REGISTERED AND TRACKED REGARDING DESIGNEE POOR OR UNETHICAL PERFORMANCE. THIS IS A MAJOR MISTAKE ON THE PART OF THE ADMINISTRATION. WHY HAS THIS SYSTEM NOT BEEN INTRODUCED? THE FAA IS CURRENTLY HELD TO THE CUSTOMER SERVICE INITIATIVE.

IN THE ADMINISTRATIONS EFFORTS TO ALLEVIATE RESPONSIBILITY FROM THE FAA INSPECTORS, IT HAS CREATED A MONSTER ORGANIZATION, THAT PALES THE SIZE OF THE FAA INSPECTOR FORCE, AND HAS MADE IT INTO AN UNMANAGABLE, PROBLEMATIC SYSTEM THAT HAS DEEP ROOTED DEFICIENCIES THAT CANNOT POSSIBLY BE OVERSEEN BY THE CURRENT INSPECTOR WORKFORCE. WHY INCREASE THE DESIGNEE'S WHEN THE FAA CAN'T MANAGE THE PRESENT DESIGNEES?

FINALLY, THE DESIGNEE'S HAVE POSITIONED THEMSELVES INTO REGARDING THEIR DESIGNATION AS A FULL TIME JOB. THIS IS A FACT. TRYING TO REMOVE A PERSONS DESIGNATION IS NOT A SIMPLE TASK AS IT IS SEEMINGLY PROVIDED IN THE ORDER OR THIS NPRM. THESE INDIVIDUALS HAVE FILED LAWSUITS AGAINST THE FAA, THE RESPONSIBLE FAA MANAGING OFFICE AND THE INDIVIDUAL FAA INSPECTOR WHO HAS RESPONSIBILITY OF MANAGING THEIR DESIGNATION. THESE INDIVIDUAL DESIGNEE HOLDERS HAVE THE FINANCIAL MEANS WITH ALL TO COUNTER AN ALREADY OVERBURDENED FAA LEGAL SYSTEM. IN REALITY, IT IS A VERY DIFFICULT TASK TO TRY TO REMOVE A DESIGNEE AUTHORIZATION UNDER THE PRESENT SYSTEM EVEN WHEN COMPETENCE IS THE ISSUE. THIS IS THE FACT. THE SYSTEM HERE IS BROKEN. THE DESIGNEE DEFENDS ITSELF WITH FUNDS THAT WERE CHARGED TO THE PUBLIC FOR A PRODUCT THAT SHOULD HAVE BEEN PROVIDED FROM THE FAA.

THIS SYSTEM IS DESIGNED TO FAIL WITH REGARD TO OVERSIGHT. THE AMERICAN PEOPLE DESERVE SERVICE FROM THEIR GOVERNMENT, NOT THEIR DESIGNEES. THE COST TO THE PUBLIC FROM THESE DESIGNEES IS ESSENTIALLY DOUBLE TAXATION FOR THE PRODUCT

EXPECTED TO PROVIDED BY THE AGENCY. HIRE MORE FAA INSPECTORS, PROVIDE THE TRAINING NEEDED TO KEEP THESE INDIVIDUALS CURRENT. WE CAN SPEND MILLIONS OF DOLLARS ON OTHER GOVERNMENTAL PROJECTS, BUT THE GOVERNMENT WILL NOT SPEND THE NECESSARY MONIES TO CONTINUE TO MAINTAIN THE SAFEST FORM OF MASS TRANSPORTATION IN THE WORLD.

THE GOVERNMENT WILL ONE DAY BE INVESTIGATING THE METHOD BY WHICH THE FAA EXERCISED THE DESIGNEE PROGRAM. I CAN ONLY IMAGINE THE FINDING OF THIS SUBCOMMITTEE AND THE SUBSEQUENT QUESTIONS THAT THE ADMINISTRATION WILL HAVE TO ANSWER.